

EXHIBIT G

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Georgia State Conference
of the NAACP; Georgia
Collation for the People's
Agenda, Inc; Galeo Latino
Community Development Fund,
Inc.,

Plaintiffs,

vs.

CIVIL ACTION FILE NO.
1:21-CV-5338-ELB-SCJ-SDG

STATE OF GEORGIA; BRIAN KEMP,
IN HIS OFFICIAL CAPACITY AS
THE GOVERNOR OF THE STATE OF
Georgia; Brad Raffensperger,
in his official capacity as
the secretary of State of
Georgia,

Defendants.

VIDEOTAPED HYBRID ZOOM
30(b)(6) and 30(b)(1)
DEPOSITION OF
BONNIE RICH
January 18, 2023
9:11 A.M.

18 Capitol Square SW
Atlanta, Georgia
Lee Ann Barnes (via Zoom), CCR-1852B, RPR, CRR, CRC

1 than your conversations with your attorney?

2 A. That and when members would come up and
3 tell me that they liked it.

4 Q. And so do you have any understanding of
5 what changes were made between the November 2 map
6 and this map?

7 A. Again, it may have been the individual
8 legislator input. I just do not remember. Seems
9 like we were trying to continue to tweak the map,
10 and I think we may have unpaired two Democrat
11 candidates, is what I seem to recall.

12 Q. Did you review this map to see whether it
13 complied with the Voting Rights Act?

14 A. I asked my lawyers if it did and they said
15 that it does -- that it did.

16 Q. Did you ask anyone else?

17 A. No.

18 Q. Did anyone else offer an opinion on that
19 to you?

20 A. No, I don't think anybody else really
21 would have been qualified to do that.

22 Q. Did you view preserving or creating
23 competitive districts as a goal for the State House
24 map?

25 A. I'm sorry?

1 Q. Okay. Do you know why preclearance might
2 come back into play?

3 A. I do not.

4 Q. Okay. I'm going to ask you now to go to
5 page 7 that's identified on the bottom by -4306.

6 A. Okay.

7 Q. And if you look at the middle bullet,
8 could you read that aloud?

9 A. "Prohibition on using partisan data: Line
10 drawers, whether they be commissioners, non-partisan
11 staff or legislators are prohibited from using" --
12 sorry, I looked away -- "incumbent residences,
13 election results, party."

14 Q. Was partisan data relied on during the
15 redistricting process?

16 A. It's my understanding that it was.

17 Q. Was any of this particular partisan data?

18 A. I don't know what -- oh, I do know we
19 relied on incumbent residences. I don't know that
20 that was considered partisan, but that was something
21 that both parties submitted, their incumbent's
22 addresses to be considered.

23 Q. What about election results?

24 A. I believe so, yes.

25 Q. And party?

1 A. I did.

2 Q. And I believe you said earlier, the
3 Democratic members except for a handful of them
4 didn't show up for meetings or try to meet with you.

5 A. Correct.

6 Q. And there was a portal that was made to
7 receive public comments as well?

8 A. Yes, that's correct.

9 Q. And you received, I guess, hundreds of
10 comments at that portal?

11 A. I think at last count it was in the 900s
12 and I thought it went over 1,000.

13 Q. And all those were made available to
14 members to review; right?

15 A. Yes.

16 Q. And you -- you reviewed those comments, as
17 you said?

18 A. Yes, I did.

19 Q. And we had some discussion about the
20 education data the committees hold.

21 Do you recall inviting a variety of
22 different groups interested in redistricting?

23 A. I did.

24 Q. In both political parties?

25 A. Yes, both parties.

1 Q. And the National Conference of State
2 Legislatures?

3 A. That is correct.

4 Q. And the guidelines for the committee were
5 adopted after that educational process; is that
6 right?

7 A. That is correct.

8 Q. In the map drawing process, I know you
9 talked about you primarily did that in the
10 Reapportionment Office with Ms. Wright or with
11 Mr. Knight; right?

12 A. Correct.

13 Q. Was political data generally displayed as
14 you looked at different districts?

15 A. The political data, if you mean the
16 election results, yes.

17 Q. And so it's fair to say you were aware of
18 the partisan impact of district lines and you looked
19 at various drafts?

20 A. Yes.

21 Q. When you held the committee meetings
22 during the special session, did you generally
23 receive public comment at those meetings as well?

24 A. I -- I did not at the very first meeting
25 where Leader Beverly and I both presented our maps